

EXHIBIT A

Documents Perfectus Has Agreed to Produce

In response to Vale's Subpoena, Perfectus Real Estate Corporation and Tarpley Belnord Corporation (collectively, "Perfectus") have agreed to produce the following categories of non-privileged documents for the time period of January 1, 2010 through the present day:

- All of their monthly bank statements.
- All agreements and contracts between themselves and BSG Entities.
- All communications between themselves and BSG Entities reflecting payments or transfers of assets from the latter to the former.
- All documents reflecting payments or transfers of assets from BSG Entities to Perfectus.
- All documents reflecting interests held by BSG Entities in Perfectus or in Perfectus' assets.
- All board meeting minutes that reflect the transfer of funds or assets to Perfectus from the BSG Entities.
- All financial statements reflecting any debt or equity interest held by any BSG Entities in Perfectus or any of Perfectus' assets.
- All organizational charts that reflect Perfectus' organizational structure or hierarchy.
- All documents that reflect the BSG Entities' investment in, ownership of, or loans to the Subject Properties.¹
- All documents that reflect the present beneficial ownership of the BSG Entities in the Subject Properties.
- All documents that reflect the BSG Entities' actual or beneficial interests in the Subject Properties.

¹ The phrase "Subject Properties" shall have the meaning ascribed to it in Vale's Section 1782 subpoena and this Court's Order, both dated July 20, 2020.